

01-30-09

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF HAWAII

----- In the Matter of -----

HAWAIIAN ELECTRIC COMPANY, INC.
HAWAII ELECTRIC LIGHT COMPANY, INC.
MAUI ELECTRIC COMPANY, LIMITED

For Approval of the Advanced Metering Infrastructure (AMI) Project and Request To Commit Capital Funds, to Defer and Amortize Software Development Costs, To Begin Installation of Meters and Implement Time-of-Use Rates, for Approval of Accounting and Ratemaking Treatment, and Other Matters

Docket No. 2008-0303

PUBLIC UTILITIES
COMMISSION

2009 JAN 30 P 3:42

FILED

MOTION TO INTERVENE
OF
HAWAII RENEWABLE ENERGY ALLIANCE
AND
CERTIFICATE OF SERVICE

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Implement Time-of-Use Rates, for)	
Approval of Accounting and Ratemaking)	
Treatment, and Other Matters)	
_____)	

I. INTRODUCTION

The Hawaii Renewable Energy Alliance ("Movant") hereby moves the Hawaii Public Utilities Commission ("Commission") for an order allowing Movant to intervene as a party in the instant docket.

II. MOTION TO INTERVENE OF THE HAWAII RENEWABLE ENERGY ALLIANCE

BACKGROUND

The Hawaii Renewable Energy Alliance (HREA) is a Hawaii-based, private, non-profit corporation, exempt from federal income tax under Section 501(c)(6) of the Internal Revenue Code of 1986, composed of developers, system integrators, manufacturers, distributors, scientists, engineers, and advocates in renewable energy. Individual HREA members were intervenors in the Commission's Docket No. 94-0226 (Renewable Energy) and in the four rounds of HECO's IRP, including the Externalities Working Group, Supply-Side and DSM Advisory Committees. HREA was a member of the Advisory Groups for both HECO and MECO IRPs, and HREA was an intervenor in Docket No. 99-0004 (MECO IRP – 2000 to 2020), which was MECO's third round IRP, and HECO IRP-4 (No. 2007-0084).

HREA was an intervenor in the Electric Competition (No. 96-0493), Distributed Generation (No. 03-371), Competitive Bidding for New Generation (No. 03-372), and Demand-Side Management/Energy Efficiency (No. 05-0069) dockets. HREA is currently an intervenor in the following dockets: HECO DG Tariffs (No. 2006-0497), KIUC DG Tariffs (No. 2006-0498), Net Metering (No. 2006-0084), PAYS® (No. 2006-0425), Public Benefits Fund (2007-0323), Renewable Portfolio Standards (2007-0008), Renewable Energy Infrastructure Program (No. 2007-0416), Feed-In Tariffs (No. 2008-0273) and Decoupling Mechanism (2008-0274).

Accordingly, HREA has a substantial and continuing interest in the subject of policy and all matters related to renewables in the electric utility sector. Regarding the instant docket, HREA's interests in Advanced Metering Infrastructure ("AMI") and Time of Use Rates ("TOUR") extend to discussions and positions taken by HREA in the DSM, RPS, REIP, HECO-DG Tariffs and Feed-In Tariffs dockets. These discussions included the relative merits of time-of-use rates and/or a tiered rate structures to reduce electricity demand.

In the instant docket, on page of the HECO Companies' application, there is a discussion of the 'HCEI Agreement' in which the Governor, DBEDT, the CA and HECO outlined an implementation approach for Advanced Metering Infrastructure. Not a Party to this Agreement, HREA believes there are a number of issues related to the Agreement and the instant docket that need to be discussed further, e.g., (i) should all customers be on time-of-use rates, as opposed to alternate rate structures, such as "tiered block rates," (ii) are Advanced Meters only necessary for those customers on time-of-use rates, (iii) are all Advanced Meters and their related supporting software created equal, (iv) what criteria should be used in the selection, installation and operation of Advanced Meters and software, and (iv) given that, what are the overall cost impacts to ratepayers?

ARGUMENT

Pursuant to Hawaii Revised Statutes Section 269-6 and Sections 6-61-41 and 6-61-55, Rules of Practice and Procedure before the Public Utilities Commission, Chapter 61, of Title 6 of the Hawaii Administrative Rules, Movant states the following in support of its motion:

1. **Nature of Movant's Statutory or other Right to Participate in this Proceeding.**

By opening this Docket, the Public Utilities Commission has invited any interested individual, entity, agency or community or business organization to file a motion to intervene in this docket or to participate without intervention. Movant is an "organization" within the meaning of the invitation.

2. **The Nature and Extent of the Applicant's Property, Financial, and Other Interest in the Pending Matter.**

Movant's member organizations and individuals are companies, consultants or agents involved in manufacturing, marketing, selling, installing and operating renewable projects in Hawaii, and are concerned about the market impacts of the proposed AMI and time-of-use-rate structures. As noted above, HREA believes there are a number of issues related to the Agreement and the instant docket that need to be discussed further. Accordingly, given that there are different potential market outcomes from an actual AMI and TOUR implementation approach, there are substantial industry financial and other interests implicated in this docket.

3. **Effect of Pending Order upon Movant's Interest.**

See #2 above.

4. **Other Means by Which the Movant's Interest may be Protected.**

None.

5. **Extent to Which Movant's Interest will be Represented by Other Parties.**

None. For example, the utilities and the Consumer Advocate cannot adequately represent the interests of HREA and its individual members.

6. Extent to Which Movant Can Assist in the Development of a Sound Evidentiary Record.

HREA will provide the resources, including professional expertise and time, necessary for effective representation, and to assist in the development of a sound evidentiary record.

7. Extent to Which Movant's Participation will Broaden the Issues or Delay the Proceeding

None.

8. Extent to Which Movant's Interest from the General Public

See #2 above.

9. Whether the applicant's position is in support of or in opposition to the relief sought

HREA is interested in working with the other parties and participants (if any) to resolve issues in the instant docket. We anticipate the result will provide overall benefits to the state, including the potential to decrease customer demand while also facilitating implementation of new renewable projects in Hawaii, especially on the customer-side of the meter, thereby increasing our energy security and supporting our state goal to reduce our dependence on imported energy, as now embodied in the Hawaii Clean Energy Initiative.

CONCLUSION

Based on the foregoing, Movant respectfully requests that the Commission grant Movant's Motion to Intervene.

DATED: January 30, 2009, Honolulu, Hawaii



President, HREA

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Motion to Intervene upon the following parties by causing a copy(ies) hereof to be hand-delivered or mailed, postage prepaid and properly addressed to each such party, or electronically transmitted:

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Date: January 30, 2009



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